

Andrew Fullman
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2019 AUG 28 P 11: 56

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Pro Se. Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
 PENNSYLVANIA

ANDREW FULLMAN,)	CIVIL ACTION
)	
Plaintiff,)	
)	
v.)	
)	
CITY OF PHILADELPHIA,)	
POLICE COMMISSIONER RICHARD ROSS, JR.,)	
EILEEN A. BONNER,)	
JOHN DOE,)	
)	
Defendants.)	No. 17-2673

PLAINTIFF'S MOTION TO JOIN ADDITIONAL PARTIES TO ACTION

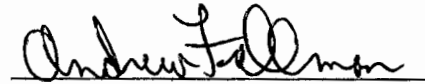
Plaintiff Andrew Fullman, respectfully submits this Motion to Join Additional Parties to this action pursuant to Rules 19 and 20 of the Federal Rules of Civil Procedure. Plaintiff would like to add five (5) additional defendants to this action. Plaintiff aver that Lt. Lukach and Christopher Flacco, the Chief Inspector, had knowledge of Plaintiff's complaints and the disclosure of his statements to Philadelphia police regarding the covering-up of two (2) shootings by the same individuals on or about May 6, 2014 and August 19, 2014 but failed to do anything about it. Christopher Flacco responded to Plaintiff's letter to Richard Ross and verified that Lt. Lukach also had knowledge of the matter and failed to do anything about it. It is obvious by *Exhibit "G-2"* of Plaintiff's Substitute Amended Complaint that Christopher Flacco spoke in Richard Ross' stead. As part of Flacco's job duty, he was required to inform Richard Ross of Plaintiff's October 11, 2016 letter.

It should be noted that there was never any discovery conducted in this case due to a stay of discovery filed by defense counsel. In addition, during the scheduling conference on July 31, 2019, the defense counsel claimed that Richard Ross had no knowledge of the Plaintiff's letter which Plaintiff totally disagrees with as the letter was addressed directly to Richard Ross via Certified Mail.

Plaintiff would also like to add Northwest Detective Division, Kevin Hall and Lt. George Mullen as possible defendants to this matter for having knowledge of the cover-up of the two shootings, threats towards Plaintiff, and the disclosure of his statements. The Defendants named in this Motion but pretty much ignored Plaintiff's complaints and failed to do anything about it as demonstrated in *Exhibits "I-2 and J-2."* The named Defendants failed to help the Plaintiff.

WHEREFORE, Plaintiff prays that this Honorable Court will grant his motion to add the above named five (5) defendants to this action.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andrew Fullman", written over a horizontal line.

Andrew Fullman, Plaintiff

Date: August 29, 2019

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810 Arch Street, Apt. 304
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Defendants.)	No. 17-2673

CERTIFICATE OF SERVICE

I, Andrew Fullman, hereby certify that on the 29th day of August, 2019, I caused a true and correct copy of PLAINTIFF'S MOTION TO JOIN ADDITIONAL DEFENDANTS TO THIS ACTION to be served via First Class Mail upon the following:

Jeffrey Mozdziok
Deputy Attorney General
1600 Arch Street, Suite 300
Philadelphia, PA 19103
(*Attorney for Agent Eileen M. Bonner)

Tara Fung
Assistant City Solicitor
1515 Arch Street, 14th Floor
City of Philadelphia Law Department
Philadelphia, PA 19102
(215) 683-5445
(Attorney for Police Commissioner Richard Ross, Jr.)

Date: August 29, 2019


Andrew Fullman, Plaintiff